

FEB 02 7000

EIS002195

MR. HADDER: Hello. My name is John Hadder and I work with a Nevada based organization called Citizen Alert, and we've been dealing with this nuclear issue for a long time as well as other people that have come up here.

Citizen Alert will be submitting for written comments later on, as well, but I just want to say a few words right now, and I probably want to address the question and answer fiasco that didn't happen or did happen, however you think about it, and I want to regard this in terms of what happened in Salt Lake City with Yucca Mountain.

I specifically was asking the question there that does the change -- the proposed change in site suitability guidelines, will that affect the design of the repository, and I was stalled.

They could not answer the question, and when I pressed on it a little bit, I was told to ask the question here and I was also told that it's not connected to the process, the process of the EIS -- the DEIS.

That's very interesting that they're not connected. That is to say that the -- the -- the per -- the total system performance that's the -- now the proposed way that Yucca Mountain will be passed doesn't depend at all upon any kind of guidelines for passing it.

Let's think about that for a second. They were telling me that they're not related, that the question I was asking at that time was not connected to the design of the repository -- well, wasn't connected to it. I couldn't ask that question at that time.

So I ask that question again, will the site suitability guideline affect the design of the repository, and if they do, shouldn't these guidelines have already been decided on a long time ago?

Well, I believe they were back in 1986, so that means to me that the whole process of the EIS, the Draft EIS came out way before it should have been.

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We don't even know what the guidelines are going to be. How can you possibly design a repository, and especially since as stated in 10 CFR 63 and 10 CFR 963 that, in fact, the design, the manmade engineer barriers are hinged upon that.

I mean, the original siting guidelines are depending more on the mountain itself as -- as isolation. Now the concept is really that the mountain will not really isolate the waste hardly at all, but it mostly depends on engineer barriers.

So now it seems even more important than ever that we get our guidelines sorted out -- guidelines sorted out completely and have -- and final before we do our Draft Environmental Impact Statement.

That was part of the reason why I was asking the question, and I got completely stalled around, and I think that what we've seen is a pattern, and this is a pattern that I brought out then, too, that people don't trust the Department of Energy. Questions are often unanswered.

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Part of the reason for a Q/A in an open forum is so that everyone can hear, so everyone is part of it. Oh, sure, I may get the response to my answer in writing and I may try to share that with people, but this is part of the public process.

That's what -- that why we have a National Environmental Policy act. That's why we have these things, is partly for public forum. That's why we should have had a question and answer period, and I feel like I got completely run around on this issue because I thought I was asking an appropriate question at a time two, three weeks ago and I was told to ask it now and now I'm told we don't have anyone, and as Suzy pointed out in the regulation, there should have been someone here.

That's the reason for question/answer, and that's what the DOE should have done and I think that this -- these hearings and the process is inadequate because of that and should be done over again.

- 2 The timing has been mentioned before about these. The overlap between the notice and this -- and the comment period for this change and the comment period for the Draft Environmental Impact Statement, same story.

So we're very busy trying to work on a huge document while trying to study these at the same time.

Who in the average public, who average citizens that don't have all the time to spend on this have time to spend on that? It's ridiculous.

One other -- I'll also mention that the scale of this project is unique, the scale of it. Okay. The licensing criterion indicates a 10,000 year period.

Well, even the National Academy of Sciences doesn't agree with that in the report in 1995. They even indicate that that's ridiculous, but the point is even that period is enormous in scale, enormous.

The amount of radioactivity that we're going to put in Yucca Mountain is enormous. It's enormous and it's going to be there forever. Forever.

So it seems to me that the Department of Energy, our government is incumbent upon us to make an extra effort, an extra, extra effort, a monumental effort to get the public involved with in this.

We're making decisions that are going to affect people's children and grandchildren forever. Forever. We have never really done that before.

So the fact that this room is not packed with people is testimony to the fact that the process is ridiculous and fails to do what it's supposed to do.

This is not a usual kind of regulation change. There is not a usual kind of project. This room should be overflowing, and it would be if people knew really what was going on, and it's the Department of Energy's job, it's our government's job to inform and to educate properly, and that has not happened.

And that's why I'm here, that's why Suzy's here, other people are having to do what the Department of Energy's supposed to be doing, and we don't have that kind of budget.

Finally, I agree with Judy. We shouldn't be here. It's ridiculous. This shouldn't have happened. We should not have this -- this process should not be ongoing, but I think the underpinning behind this change is to remove qual -- conditions that have to do with the mountain itself.

- 3 The changes in the siting guidelines, the changes in the NRC's regulation all remove conditions of the mountain and relies completely -- lies so solely on engineer barriers.

It's a very important part, and this is a calculation process, a cal -- who's doing the calculation? This is another thing that was missing in the DEIS is details on that.

So that's another important part of this is we're now removing -- if it's basically engineer barriers, why do we need the mountain anyway? Why don't we just build the damn thing.

The point being is that we've really changed the concept of how we're doing this repository, but we're doing this in the process of doing the dance of the repository.

Everyone knows good process is you decide up- front what your conditions are and then you see if what you're looking at will meet those conditions.

That was the original idea, which I think is much better than what we're doing now.

- 4 The total system -- system performance, a lot of the public don't trust it. It's a lot of numbers crunching. It's a lot of models, it's a lot of variables. Change one little thing here, change one little thing there, you get a different outcome. It could be drastically different.

So we do process protest the entire concept of this. I do understand what the National Academy of Sciences is saying about this, but I do not accept all their conclusions.

As I said, Citizen Alert will submit written comments, but I just wanted to underscore what we're dealing with here and the importance of the public process and why people wanted their question answered, and quite frankly, I think the reason is all is -- as we all know that the questions will be very embarrassing for the Department of Energy because they don't have good answers.

Thank you very much.